

5                   **IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
                      **BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

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**APPEAL BRIEF PURSUANT TO 37 C.F.R. § 41.37**

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## I. Summary of Claimed Subject Matter

Embodiments of the present invention relate generally systems and methods for visually building multi-channel applications.

5           Independent claim 1 relates to a computer-readable medium having computer-executable modules. The computer-readable medium includes a first computer-executable module (12), a second computer-executable module (16) and a third computer-executable module (14). The first computer-executable module (12) is adapted to allow a developer to visually design workflow describing a multi-channel application capable of operating over a plurality of  
10 channels. The workflow includes a plurality of layers, where each of the layers corresponds to at least one channel of the multi-channel application. The workflow includes a plurality of states and a plurality of transitions. Each layer includes states and transitions common to at least one channel of the multi-channel application. The second computer-executable module (16) allows a developer to design views for the multi-channel application, and the third computer-executable  
15 module (14) allows the developer to integrate data sources within the multi-channel application. (See FIGS. 17, 19, 27, 28, 55 and Abstract; page 16, line 18- through page 17, line 2; page 32, lines 3-9; page 35, lines 1-3; page 36, line 22 through page 37, line 15; page 38, lines 10-22; and page 74, line 19 through page 75, line 7).

          Independent claim 7 relates to a computer system for visually building multi-channel  
20 applications. The computer system includes a graphical user interface (GUI) 400. The GUI 400 includes a user interface selection device and a display for displaying an interactive development environment (500) for visually designing workflow describing a multi-channel application capable of operating over a plurality of channels. The interactive development environment (500) allows a developer to independently design the workflow in a plurality of layers, where  
25 each layer includes states and transitions common to at least one channel of the multi-channel application. (See FIGS. 17, 19, 27, 28, 55 and Abstract; page 16, line 18- through page 17, line 2; page 32, lines 3-9; page 35, lines 1-3; page 36, line 22 through page 37, line 15; page 38, lines 10-22; and page 74, line 19 through page 75, line 7).

          Independent claim 13 relates to a computer system for visually building a multi-channel  
30 application capable of operating over a plurality of channels. The computer system includes a

graphical user interface (400) adapted to allow a user to visually build a single workflow describing a multi-channel application capable of operating over a plurality of channels, and a module for converting the visually built workflow into a markup language. The single workflow comprises a plurality of layers, where each of the layers corresponds to at least one channel of the multi-channel application. The single workflow includes a plurality of states and a plurality of transitions, where each layer includes states and transitions common to at least one channel of the multi-channel application. (See FIGS. 17, 19, 27, 28, 55 and Abstract; page 16, line 18- through page 17, line 2; page 32, lines 3-9; page 35, lines 1-3; page 36, line 22 through page 37, line 15; page 38, lines 10-22; and page 74, line 19 through page 75, line 7).

Independent claim 19 relates to a method of building a multi-channel application. According to this method, an application workflow is designed within a visual development environment in a plurality of layers. The application workflow describes a multi-channel application capable of operating over a plurality of channels. The application workflow comprises a plurality of states and a plurality of transitions. The application workflow also includes a plurality of layers, wherein each layer includes states and transitions common to at least one channel of the multi-channel application. After linking the states, the application workflow is converted into an application descriptor for delivering the application over at least one of the plurality of channels. (See FIGS. 17, 19, 27, 28, 55 and Abstract; page 16, line 18- through page 17, line 2; page 32, lines 3-9; page 35, lines 1-3; page 36, line 22 through page 37, line 15; page 38, lines 10-22; and page 74, line 19 through page 75, line 7).

In response to the notification of non-compliant appeal brief, Appellants submit a revised Summary of Claimed Subject Matter with reference to the specification page and line number and to the drawings by reference characters.

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Respectfully submitted,  
Ingrassia, Fisher & Lorenz

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/ERIN P. MADILL/  
Erin P. Madill  
Registration No. 46, 983  
Customer No. 29,906